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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

D-1 Alex Albert Castro,
also known as "Sniper,"
D-2 Jason Dale Kechego,
also known as "J," and
D-3 Adam Taylor Wright,
also known as "Creeper,"

Defendants.

Case:2:19-cr-20498

Judge: Edmunds, Nancy G.

MJ: Majzoub, Mona K.

Filed: 07-25-2019 At 04:19 PM

SEALED MATTER (LG)

Violations:

18 U.S.C. § 1111(a)

18 U.S.C. § 1117

18 U.S.C. § 113(a)

18 U.S.C. § 111(a)(1)

18 U.S.C. § 2

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**First Degree Premeditated Murder; Aiding and Abetting-
(18 U.S.C. § 1111(a); 18 U.S.C. § 2)**

D-1 Alex Albert Castro,
also known as "Sniper,"
D-2 Jason Dale Kechego,
also known as "J," and
D-3 Adam Taylor Wright,
also known as "Creeper"

1. On or about January 2, 2019, in the Eastern District of Michigan,
defendants, at the Federal Detention Center, Milan, a place within the special

maritime and territorial jurisdiction of the United States as defined in Title 18, United States Code, Section 7(3), Alex Albert Castro, also known as “Sniper,” Jason Dale Kechego, also known as “J,” and Adam Taylor Wright, also known as “Creeper,” defendants herein, did willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully kill Christian Maire, by stabbing, beating, kicking, and stomping him, in violation of Title 18, United States Code, Section 1111(a), and did aid and abet one another in the commission of said unlawful murder, in violation of Title 18, United States Code, Section 2.

NOTICE OF SPECIAL FINDINGS – ALEX ALBERT CASTRO

2. The Grand Jury incorporates by reference and re-alleges the allegations described in paragraph 1 above and makes the following special findings:

A. Statutory Factors Enumerated under Title 18, United States Code.,

Section 3591

- i. Defendant Castro was 18 years of age or older at the time of the offense [18 U.S.C. § 3591(a)];
- ii. Defendant Castro intentionally killed Christian Maire [18 U.S.C. § 3591(a)(2)(A)];
- iii. Defendant Castro intentionally inflicted serious bodily injury that resulted in the death of Christian Maire [18 U.S.C. § 3591(a)(2)(B)];

- iv. Defendant Castro intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Christian Maire died as a direct result of the act [18 U.S.C. § 3591(a)(2)(C)];
- v. Defendant Castro intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act [18 U.S.C. § 3591(a)(2)(D)].

B. Statutory Factors Enumerated under Title 18, United States Code, Section

3592(c)

- i. Defendant Castro committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim [18 U.S.C. § 3592(c)(3)].
- ii. Defendant Castro has previously been convicted of violating title II or III of the Comprehensive Drug Abuse Prevention and Control Act of 1970 for which a sentence of 5 or more years may be imposed [18 U.S.C. § 3592(c)(12)].

iii. Defendant Castro intentionally attempted to kill more than one person in a single criminal episode [18 U.S.C. § 3592(c)(16)].

NOTICE OF SPECIAL FINDINGS – JASON DALE KECHEGO

3. The Grand Jury incorporates by reference and re-alleges the allegations described in paragraph 1 above and makes the following special findings:

A. Statutory Factors Enumerated under Title 18, United States Code,

Section 3591

- vi. Defendant Kechego was 18 years of age or older at the time of the offense [18 U.S.C. § 3591(a)];
- vii. Defendant Kechego intentionally killed Christian Maire [18 U.S.C. § 3591(a)(2)(A)];
- viii. Defendant Kechego intentionally inflicted serious bodily injury that resulted in the death of Christian Maire [18 U.S.C. § 3591(a)(2)(B)];
- ix. Defendant Kechego intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Christian Maire died as a direct result of the act [18 U.S.C. § 3591(a)(2)(C)];

- x. Defendant Kechego intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act [18 U.S.C. § 3591(a)(2)(D)].

B. Statutory Factors Enumerated under Title 18, United States Code, Section

3592(c)

- i. Defendant Kechego has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than 1 year, involving the use or attempted or threatened use of a firearm (as defined in 18 United States Code Section 921) against another person [18 U.S.C. § 3592(c)(2)].
- ii. Defendant Kechego committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim [18 U.S.C. §3592(c)(3)].
- iii. Defendant Kechego intentionally attempted to kill more than one person in a single criminal episode [18 U.S.C. § 3592(c)(16)].

NOTICE OF SPECIAL FINDINGS – ADAM TAYLOR WRIGHT

4. The Grand Jury incorporates by reference and re-alleges the allegations described in paragraph 1 above and makes the following special findings:

A. Statutory Factors Enumerated under Title 18, United States Code,

Section 3591

- xi. Defendant Wright was 18 years of age or older at the time of the offense [18 U.S.C. § 3591(a)];
- xii. Defendant Wright intentionally killed Christian Maire [18 U.S.C. §3591(a)(2)(A)];
- xiii. Defendant Wright intentionally inflicted serious bodily injury that resulted in the death of Christian Maire [18 U.S.C. § 3591(a)(2)(B)];
- xiv. Defendant Wright intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Christian Maire died as a direct result of the act [18 U.S.C. § 3591(a)(2)(C)];
- xv. Defendant Wright intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life

and the victim died as a direct result of the act [18 U.S.C. § 3591(a)(2)(D)].

B. Statutory Factors Enumerated under Title 18, U.S.C. Section 3592(c)

- i. Defendant Wright has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than 1 year, involving the use or attempted or threatened use of a firearm (as defined in Title 18, United States Code Section 921) against another person [18 U.S.C. § 3592(c)(2)].
- ii. Defendant Wright committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim [18 U.S.C. § 3592(c)(3)].
- iii. Defendant Wright intentionally attempted to kill more than one person in a single criminal episode [18 U.S.C. § 3592(c)(16)].

COUNT TWO
Conspiracy to Commit First Degree Premeditated Murder-
(18 U.S.C. § 1117)

D-1 Alex Albert Castro,
Also known as "Sniper,"
D-2 Jason Dale Kechego,
Also known as "J,"
D-3 Adam Taylor Wright,
Also known as "Creeper"

5. From on or about December 5, 2018, to on or about January 2, 2019, in the Eastern District of Michigan, Alex Albert Castro, also known as "Sniper," Jason Dale Kechego, also known as "J," and Adam Taylor Wright, also known as

“Creeper,” defendants herein, knowingly and intentionally combined, conspired, confederated and agreed together and with each other to violate Section 1111 of Title 18, United States Code.

General Conspiracy Allegations

6. That at all times pertinent to this Indictment, ALEX CASTRO, also known as “Sniper,” JASON KECHEGO, also known as “J,” and ADAM WRIGHT, also known as “Creeper,” defendants herein, were incarcerated at the Milan Detention Center, a federal facility operated by the United States Bureau of Prisons, and a place within the special maritime or territorial jurisdiction of the United States in Milan, Michigan on land acquired for the use of the United States and under its exclusive jurisdiction.

7. That during the time frame of the charged conspiracy, ALEX CASTRO, also known as “Sniper,” JASON KECHEGO, also known as “J,” and ADAM WRIGHT, also known as “Creeper,” defendants herein, did conspire and agree to prey upon, assault, and murder smaller and weaker inmates confined at the Milan Detention Center.

8. That from sometime on or about December 5, 2018 up to and including January 2, 2019, said dates being approximate, in the federal Eastern District of Michigan, ALEX CASTRO, also known as “Sniper,” JASON KECHEGO, also known as “J,” and ADAM WRIGHT, also known as “Creeper,”

defendants herein, did knowingly, voluntarily, and unlawfully combine, conspire, confederate, and agree to willfully, deliberately, maliciously, with premeditation and malice aforethought kill one Christian Maire, one Michael Figura, and one Craig Evans, by stabbing, beating, kicking, and stomping them, at a place within the special maritime or territorial jurisdiction of the United States, to-wit: within the Milan Correctional Facility, Milan, Michigan on land acquired for the use of the United States and under its exclusive jurisdiction, in violation of Section 1117 of Title 18, United States Code, and Sections 7(3) and 1111(a) of Title 18, United States Code, and that in furtherance of said unlawful conspiracy, one of the defendants committed at least one of the overt acts set forth below:

Overt Acts Which Furthered the Conspiracy

9. In order to further the unlawful conspiracy, one or more of the conspirators committed the following acts, among others:

10. Defendants met and discussed killing Christian Maire;

11. Defendants obtained a homemade knife commonly called a “shank” with the intent to use said shank to kill Christian Maire;

12. Defendants walked upstairs to the cell of Christian Maire;

13. Defendant JASON KECHEGO, also known as “J,” grabbed Christian Maire as he attempted to flee the assault and commenced beating upon Christian Maire;

14. Defendant ALEX CASTRO, also known as "Sniper," stabbed Christian Maire multiple times with a shank;
15. Defendant JASON KECHEGO, also known as "J," stabbed Christian Maire multiple times with a shank;
16. Defendant ADAM WRIGHT, also known as "Creeper," stabbed Christian Maire multiple times with a shank;
17. Defendant ALEX CASTRO, also known as "Sniper," punched, kicked and stomped Christian Maire multiple times;
18. Defendant JASON KECHEGO, also known as "J," punched, kicked and stomped Christian Maire multiple times;
19. Defendant ADAM WRIGHT, also known as "Creeper," punched, kicked and stomped Christian Maire multiple times;
20. Defendant ALEX CASTRO, also known as "J," punched, beat, stabbed, and kicked Michael Figura multiple times;
21. Defendant JASON KECHEGO, also known as "Sniper," punched, beat, stabbed, and kicked Michael Figura multiple times;
22. Defendant ADAM WRIGHT, also known as "Creeper," punched, beat, stabbed and kicked Michael Figura multiple times;
23. Defendant ADAM WRIGHT, also known as "Creeper," did impede, obstruct, chase and assault Corrections Officer Kurt Greenleaf to prevent

him from attempting to stop the Defendants' assault upon Christian Maire;

24. Defendant ADAM WRIGHT, also known as "Creeper," did impede, obstruct, and assault Corrections Officer Clinton White by punching him in the face to prevent him from attempting to stop the Defendants' assault upon Christian Maire;

25. That while Defendant ADAM WRIGHT, also known as "Creeper," impeded, obstructed and assaulted Corrections Officers Greenleaf and White, Defendant ALEX CASTRO, also known as "Sniper," did jump on top of Christian Maire and continue beating and stabbing him;

26. Defendants picked Christian Maire up off the floor and threw his body down a flight of stairs.

27. Defendants then walked together to the cell of one Craig Evans;

28. Defendant ALEX CASTRO, also known as "Sniper," punched, beat, and kicked Craig Evans multiple times;

29. Defendant JASON KECHEGO, also known as "J," punched, beat, and kicked Craig Evans multiple times;

30. Defendant ADAM WRIGHT, also known as "Creeper," punched, beat, and kicked Craig Evans multiple times;

All in violation of Title 18, United States Code, Section 1117.

COUNT THREE

**Assault With Intent to Commit Murder; Aiding and Abetting
(18 U.S.C. § 113(a); 18 U.S.C. § 2)**

D-1 Alex Albert Castro,
Also known as "Sniper,"

D-2 Jason Dale Kechego,
Also known as "J,"

D-3 Adam Taylor Wright,
Also known as "Creeper"

31. On or about January 2, 2019, in the Eastern District of Michigan, defendants, Alex Albert Castro, also known as "Sniper," Jason Dale Kechego, also known as "J," and Adam Taylor Wright, also known as "Creeper," defendants herein, at the Federal Detention Center, Milan, a place within the special maritime and territorial jurisdiction of the United States as defined in Title 18, United States Code, Section 7(3), did assault Joseph Raphael, with intent to commit murder by beating and kicking in violation of Title 18, United States Code, Section 113(a), and did aid and abet one another in the commission of said unlawful assault, in violation of Title 18 United States Code, Section 2.

COUNT FOUR

**Assault With Intent to Commit Murder; Aiding and Abetting
(18 U.S.C. § 113(a); 18 U.S.C. § 2)**

D-1 Alex Albert Castro,
Also known as "Sniper,"

D-2 Jason Dale Kechego,
Also known as "J,"

D-3 Adam Taylor Wright,
Also known as "Creeper"

32. On or about January 2, 2019, in the Eastern District of Michigan, defendants, Alex Albert Castro, also known as “Sniper,” Jason Dale Kechego, also known as “J,” and Adam Taylor Wright, also known as “Creeper,” defendants herein, at the Federal Detention Center, Milan, a place within the special maritime and territorial jurisdiction of the United States as defined in Title 18, United States Code, Section 7(3), did assault Michael Figura, with intent to commit murder by beating, kicking and stabbing him, in violation of Title 18, United States Code, Section 113(a), and did aid and abet one another in the commission of said unlawful assault, in violation of Title 18, United States Code, Section 2.

COUNT FIVE

**Assault With Intent to Commit Murder; Aiding and Abetting
(18 U.S.C. § 113(a); 18 U.S.C. § 2)**

D-1 Alex Albert Castro,
Also known as “Sniper,”
D-2 Jason Dale Kechego,
Also known as “J,”
D-3 Adam Taylor Wright,
Also known as “Creeper”

On or about January 2, 2019, in the Eastern District of Michigan, defendants, Alex Albert Castro, also known as “Sniper,” Jason Dale Kechego, also known as “J,” and Adam Taylor Wright, also known as “Creeper,” defendants herein, at the Federal Detention Center, Milan, a place within the special maritime and territorial jurisdiction of the United States as defined in Title 18, United States Code, Section 7(3), did assault Craig Evans, with intent to commit murder by

beating and kicking him, in violation of Title 18, United States Code, Section 113(a)), and did aid and abet one another in the commission of said unlawful assault, in violation of Title 18, United States Code, Section 2.

COUNT SIX

**Assaulting, Resisting, or Impeding a Federal Officer-
(18 U.S.C. § 111(a)(1))**

D-3 Adam Taylor Wright,
Also known as “Creeper”

33. On or about January 2, 2019, in the Eastern District of Michigan, defendants Adam Taylor Wright, also known as “Creeper,” defendant herein, did forcibly assault, resist, oppose, impede, intimidate, and interfere with Corrections Officer Kurt Greenleaf, while Officer Greenleaf was employed as a law enforcement officer with the United States Bureau of Prisons and while said officer was engaged in the performance of his office duties, all in violation of Title 18, United States Code, Section 111(a)(1).

COUNT SEVEN

**Assaulting, Resisting, or Impeding a Federal Officer-
(18 U.S.C. § 111(a)(1))**

D-3 Adam Taylor Wright,
Also known as “Creeper”

34. On or about January 2, 2019, in the Eastern District of Michigan, Adam Taylor Wright, also known as “Creeper,” defendant herein, did forcibly assault, resist, oppose, impede, intimidate, and interfere with Corrections Officer Clinton White, while Officer White was employed as a law enforcement officer

with the United States Bureau of Prisons and while said officer was engaged in the performance of his office duties, where such acts involved physical contact with Officer White, all in violation of Title 18, United States Code, Section 111(a)(1).

THIS IS A TRUE BILL
s/Grand Jury Foreperson

GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

s/ Mark D. Chutkow

MARK D. CHUTKOW
Chief, Criminal Division

s/J. Michael Buckley

J. MICHAEL BUCKLEY
Senior Litigation Counsel
Assistant United States Attorney

s/Andrew Picek

ANDREW PICEK
Assistant United States Attorney

Dated: 7/25/2019

United States District Court
Eastern District of Michigan

Criminal Case Co

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SEALED MATTER (LG)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it a

Companion Case Information

Companion Case Number:

This may be a companion case based on LCrR 57.10(b)(4)¹:

☐ Yes ☒ No

AUSA's Initials:

Case Title: USA v. Alex Albert Castro

County where offense occurred: Washtenaw

Offense Type: Felony

Indictment -- no prior complaint

Superseding Case Information

Superseding to Case No: _____

Judge: _____

Reason:

Defendant Name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

July 25, 2019

Date

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Assistant United States Attorney

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated